FY 2016 Homeland Security Grant Program
Frequently Asked Questions

1. **Who can apply?**
   Only eligible applicants may apply for HSGP funds. **Eligible applicants include**: Local units of government, as defined in the Department of Homeland Security Appropriations Act of 2005, refer to "any county, city, village, town, district, borough, special district, or other political subdivision of any State." The lead applicant is responsible for grant funds and administration: including but not limited to assurances and audit requirements, maintenance or records, etc.

2. **If a hospital is a partner of the applying agency, would the funds flow to the hospital or the applying agency?**
   Only the applying agency would receive the funds.

3. **Who is awarding the funds to the sub-grantees? Is it the Federal Government or the State Government?**
   The State receives the funds from the Federal Government and awards the sub-grantees.

5. **What is "WHOLE COMMUNITY"?**
   Whole of Community encompasses two key concepts:

   1. Ensuring that our response and recovery actions are driven by the actual needs of the entire affected community and the conditions on the ground, including the population demographics and geographic location; and

   2. Ensuring that we leverage and rely upon the resources of the entire emergency management team to the greatest extent possible in meeting these needs.

   3. **Whole of Community IS NOT** merely catastrophic planning. Its concepts will eventually be applied across FEMA and impact every mission that FEMA executes. Whole of Community describes a distinct operational approach that reinforces the fact that FEMA is only one part of our nation's emergency management team; that we must leverage all of the resources of our collective team in preparing for, responding to, recovering from and mitigating against all hazards; and that collectively we must meet the needs of the entire community in each of these areas.

6. **If an application identifies multiple jurisdictions, must the application have signatures from each jurisdiction?**
   Supporting documentation, such as letters of recommendation/support/MOUS, must be attached.

7. **Do specifications on purchases need to be included in the application?**
   Yes, include anything that will make it clear to the reviewer as to what is being purchased and why it is needed. Also the AEL sheets showing eligibility of the item must be attached to the application. http://www.fema.gov/preparedness-non-disaster-grants

8. **Can an agency submit more than one application?**
    Yes, an agency can submit as many applications as they want. It is important that only one project be identified on each application.

10. **Is there mandatory cost share or matching required?**
    No – This grant is 100% federally funded.

11. **Are there any document pages that do not count as part of the page limit? For example, what if we need a page to cite our references? Does this page have to count?**
    There is no limit on supporting documents, attachments, or budget information.

12. **What is the period of the award?**
    Projects funded under this program application have up to one month prior to the grant's federal expiration date to complete approved activities and submit their final reimbursement request including invoices and cancelled checks. Projects must be completed by July 30. 2019.

13. **What are the reporting requirements?**
    Each project funded by the NH DOS under the HSGP shall contain an evaluation component. Quarterly reports containing programmatic and financial information will be required.

    DHS mandates recourse typing for all assets. The forms and instructions for this will be supplied upon grant award.

    The DOS/GMU may conduct periodic site visits to review grant compliance, assess management controls, assess the applicable activities and provide technical assistance. In addition, the subgrantee agrees to provide any data or information needed for the purposes of monitoring and program evaluation.

14. **What are the Financial Requirements that pertain to this grant?**
    The financial management requirements of federal and state government, as well as the NH Department of Safety's policies and procedures, govern grants funded under HSGP. Grant activities must be conducted in accordance with the applicable guidance of 2 CFR Part 200 as of 12/26/2014.

15. **What is supplanting and how does it apply to a project?**

    Federal Homeland Security grant funds will be used to **supplement** (add to) existing funds, and will not **supplant** (replace) funds that have been locally appropriated for the same purpose. Potential supplanting will be addressed in the application review as well as in the pre-award review, post award monitoring, and the audit. Applicants and/or grantees will be/may be required to supply documentation certifying that a reduction in non-federal resources occurred for reasons OTHER than the receipt or expected receipt of federal Homeland Security grant funds.

    Supplanting funds is loosely defined (for these purposes) as using federal grant money to "replace" or "take the place of" existing local funding for equipment or programs. The funds are intended to provide local entities with **increased capabilities** or to build capacity to address

CBRNE/WMD terrorist incidents... The funds are not to be used to replace items that are worn out/broken or for replacing (supplanting) routine local budget expenses. Supplanting funds is loosely defined (for these purposes) as using federal grant money to "replace" or "take the place of" existing local funding for equipment or programs. The funds are intended to provide local entities with **increased or in 2016 sustained capabilities** or to build capacity to address CBRNE/WMD terrorist incidents. The FY 2016 HSGP plays an important role in the implementation of Presidential Policy Directive 8 (PPD-8) by supporting the development and sustainment of core capabilities. Core capabilities are essential for the execution of each of the five mission areas outlined in the *National Preparedness Goal* (NPG).

16. **Is Project Income allowed?**
   No. Project income is not allowable under the protocols of the NH Department of Safety.

17. **Are any of the eligible equipment items on State Price Contract?**
   Please refer to the NH Department of Administrative Services, Bureau Purchase and Property website. https://das.nh.gov/purchasing/Contracts_posteddte.asp?sort=cna

18. **Can we contract with Consultants?**
   Compensation for individual consultant services must be reasonable and consistent with that paid for similar services in the market place. The policy is that the maximum rate for consultants is $650 (excluding travel and subsistence costs) for an 8-hour day or $81.25 per hour. An 8-hour day may include preparation, evaluation and travel time in addition to the time required for the actual performance. Additionally, travel and subsistence costs may be paid. A request for compensation for over $650 a day requires prior approval and additional justification. This must also be approved by the US Department of Homeland Security/FEMA.

   2016 HSGP grant guidance the following <u>may</u> apply to your project:
   HSGP Program grantees using funds for construction projects must comply with the *Davis-Bacon Act* (40 U.S.C. 3141 *et seq.*). Grant recipients must ensure that their contractors or subcontractors for construction projects pay workers employed directly at the work-site no less than the prevailing wages and fringe benefits paid on projects of a similar character. Additional information, including Department of Labor (DOL) wage determinations, is available from the following website http://www.dol.gov/whd/govcontracts/dbra.htm. It is recommended that your Department review the criteria that apply to the project at this site and act in accordance with guidance from US DOL.

   Arrangements with individuals must ensure that:
   - Dual compensation is not involved (i.e., the individual may not receive compensation from his regular employer and the applicant for work performed during a single period of time even though the services performed benefit both).
   - The contractual agreement is written, formal, proper and otherwise consistent with the applicant's usual practices.
   - Time and/or services for which payment will be made and rates of compensation must be supported by adequate documentation.

- Travel and subsistence costs are at an identified rate consistent with the cost allowed in Section III, Travel.

19. What can Homeland Security Grant Program funding be used for?

See: http://www.fema.gov/preparedness-non-disaster-grants . HSGP funding shall be used in areas for projects that enhance New Hampshire's capabilities. The State Homeland Security Grant Program (SHSGP) is a core assistance grant program that provides funds to build capabilities at the state, local, Tribal, and territorial levels and to implement the goals and objectives included in the State Homeland Security Strategy and initiatives in their State Preparedness Report (SPR). Under SHSGP, activities must support terrorism preparedness by building or enhancing capabilities that relate to the prevention of, protection from, response to, and recovery from terrorism (to be considered eligible). However, many capabilities which support terrorism preparedness simultaneously support preparedness for other hazards. Grantees must demonstrate this dual-purpose for any activities implemented under this program that are not explicitly focused on terrorism preparedness.

20. What kind of equipment can I apply for?

Equipment must be individually listed and approved through the original grant application or in subsequent grant adjustment notices prior to the purchase of the equipment. Allowable equipment categories for FY16 are listed in the application and on the web-based **Authorized Equipment List** (AEL) at http://www.fema.gov/preparedness-non-disaster-grants.

Information Bulletin No. 407 - Use of Grant Funds for Controlled Equipment, provides details on the process and requirements for requesting controlled equipment. FEMA Form 087-0-0-1 - Controlled Equipment Request is available for download. Any questions concerning the eligibility of equipment should be forwarded to the DOS/GMU for clarification.

Applicants shall use their own procurement procedures and regulations if they are more stringent than Federal Requirement 28 CFR Part 66 (formerly OMB Circular A-102) or OMB Circular A-110, as applicable. Minimum compliance is the federal standard. All efforts to expedite the procurement process should be made.

21. What are the Unauthorized Program Expenditures?
- Expenditures for items such as general-use software (word processing, spreadsheet, graphics, etc.), general-use computers and related equipment (other than for allowable M & A activities, or otherwise associated preparedness or response functions), general-use vehicles, licensing fees, weapons systems and ammunition.
- Acquisition of land
- Hiring of public safety personnel
- Activities unrelated to the completion and implementation of the SHSP
- Other items not in accordance with the AEL or previously listed as allowable costs.
- FCC Licenses

22. If the state approves equipment within the application, is the local agency required to send out a bid?

The local agency must follow the local procurement regulations and laws or Federal Terms that apply to such from 2CFR 200. Whichever terms protects the Federal dollars most strenuously shall be applied and monitored for.

23. Is the installation of equipment considered construction?
No, if it is considered as additional or related equipment costs not requiring EHP approval. See AEL listing at: http://www.fema.gov/preparedness-non-disaster-grants
Yes, if the equipment will be attached to a structure in any way or if the AEL lists EHP as a requirement.

2016 HSGP grant guidance the following <u>may</u> apply to your project:
HSGP Program grantees using funds for construction projects must comply with the *Davis-Bacon Act* (40 U.S.C. 3141 *et seq.*). Grant recipients must ensure that their contractors or subcontractors for construction projects pay workers employed directly at the work-site no less than the prevailing wages and fringe benefits paid on projects of a similar character. Additional information, including Department of Labor (DOL) wage determinations, is available from the following website http://www.dol.gov/whd/govcontracts/dbra.htm. It is recommended that your Department review the criteria that apply to the project at this site and act in accordance with guidance from US DOL.

Construction and Renovation
Construction and renovation costs to achieve capability targets related to preventing, preparing for, protecting against, or responding to acts of terrorism are allowed under this program. For construction costs to be allowed, they must be specifically approved by DHS/FEMA in writing prior to the use of any program funds for construction or renovation. Limits on the total amount of grant funding that may be used for construction or renovation may apply.

Project construction using SHSP and UASI funds may not exceed the greater of $1,000,000 or 15 percent (15%) of the grant award. For the purposes of the limitations on funding levels, communications towers are not considered construction.

Written approval must be provided by DHS/FEMA prior to the use of any HSGP funds for construction or renovation. When applying for construction funds, including communications towers, at the time of application, recipients must submit evidence of approved zoning ordinances, architectural plans, any other locally required planning permits, and a notice of Federal interest. Additionally, recipients are required to submit a SF-424C Budget and Budget detail citing the project costs.

When applying for funds to construct communication towers, recipients and sub-recipients must submit evidence that the FCC's Section 106 review process has been completed and submit all documentation resulting from that review to GPD using the guidelines in EHP Supplement prior to submitting materials for EHP review. Completed EHP review materials for construction and communication tower projects **must** be submitted **as soon as possible** to get approved by the end of the period of performance

HSGP Program recipients using funds for construction projects must comply with the *Davis-Bacon Act* (40 U.S.C. § 3141 *et seq.*). Recipients must ensure that their contractors or subcontractors for construction projects pay workers no less than the prevailing wages for laborers and mechanics

employed on projects of a character similar to the contract work in the civil subdivision of the state in which the work is to be performed. Additional information regarding compliance with the *Davis-Bacon Act*, including Department of Labor (DOL) wage determinations, is available from the following website http://www.dol.gov/whd/govcontracts/dbra.htm.

OPSG funds may not be used for any type of construction

24. Is computer software allowable?
Yes, if the software is used to accomplish the project activity. However, general use hardware and software is only an allowable cost under Management and Administration (M&A).

25. Would the hiring of security personnel be allowable?
No.

26. When can I purchase items on the approved budget?
After a sub-grant to a jurisdiction has been approved, DOS/GMU will issue an award document including grant requirements. Spending of funds may begin as soon as officials of the jurisdiction sign, date, and return the award documents to the DOS/GMU and you receive approval to proceed. Additional restrictions may be applied upon DOS and you will be notified of how to proceed with your grant at that time.

27. How does the grant process work as far as getting reimbursed for expenditures?
The sub-grants awarded by the DOS/GMU are reimbursement grants only, meaning that the jurisdiction must spend the money upfront for the grant approved items, complete the project installation and testing (if required) and then apply to DOS for reimbursement of those expenditures. Jurisdictions may submit the proper documentation at any time after its expenditures and project completion (reimbursement request letter on Agency letterhead, invoices, and cancelled checks).

28. Do I have to have cancelled checks before I can request reimbursement?
Yes, invoices and cancelled check(s) are required before reimbursement will be made. Also, sub-recipients must also meet the following requirements before reimbursement:
- NIMS compliance
- Single Audit compliance
- Completed quarterly report
- Resource typing is updated
- Environmental approval (when project applicable)

29. What is accepted as "proof of payment"?
"Cancelled checks " or the bank screen print showing the payment is cleared and tied to that purchase.

30. Why do I need to provide proof of payment?
DOS "reimburses" only. Proof of payment ensures that the request is a reimbursement not an advance and that only eligible approved costs are reimbursed with HSGP program funds.

Before reimbursements are made the project should be completed in accordance with approved grant plan.

31. What are the supporting documents needed to get reimbursed?
All requests for reimbursement must include a copy of invoices (not statements or quotes) and proof of payment (see #28). DOS may also require detailed comparison of purchases to match with the original application. Exercise reimbursement requests must be coordinated through the Department of Safety, Homeland Security and Emergency Management's Exercise Coordinator. Training reimbursements will be coordinated through the Department of Safety, Fire Standards and Training and EMS's Chief Jeffrey Phillips. Payroll verification is mandatory for personnel reimbursement for training and exercises. See separate background for requirements.

32. After a grant has been approved, may we make changes to the grant?
Generally, changes in the intent of an award are not allowed. On a limited basis, DOS may consider some changes, but the jurisdiction will have to document justification for such an adjustment to the grant. No changes to project plan or scope should be undertaken without prior consultation with GMU.

33. Can changes be made in the grant budget?
Changes are allowed within a grant's budget on a limited basis. But the entity must request those changes in writing along with a written justification for the adjustment. Entities may NOT move funds between grant awards such as from a Planning grant to an Equipment grant. Also see #32 here in the FAQs.

34. What happens when all my grant funds have been expended?
Once the spending cycle of a grant has been reached, all sub-grants are closed and any remaining funds from the awards are pooled. Extensions can be granted on a limited basis as long as the federal deadline is not violated. Extensions are granted only under special circumstances. The jurisdiction must justify and request the extension in writing.

DOS will issue a Closeout Letter to the jurisdiction. Officials of the jurisdiction are asked to sign, date, and return a copy of the Closeout Letter to DOS. Monitoring visits may follow. Long-term inventory reporting is required per Code of Federal Regulations-Title 2 CFR 200.313-Equipment.

35. Why am I required to keep documentation after my grant is closed?
Federal law requires that documentation (all financial records, supporting documents, statistical records pertinent to the award be retained by each organization for at least three years from the date the grant is closed at the federal level. This may be up to 5 years from when your grant was completed. Check with DOS – GMU for specifics. In addition per Federal requirement the tracking of all equipment must comply with Code of Federal Regulations-Title 2 CFR 200.313-Equipment. Updates are required every two years inclusive of reporting the final disposition of any grant acquired equipment.

36. What is NIMS Compliance?

Per the 2016 Homeland Security Funding Opportunity Announcement, grantees receiving HSGP funding are required to implement the National Incident Management System (NIMS). The NIMS uses a systematic approach to integrate the best existing processes and methods into a unified national framework for incident management. Incident management refers to how incidents are managed across all homeland security activities, including prevention, protection, and response, mitigation, and recovery. FY 2016, grantees must utilize standardized resource management concepts such as typing, inventorying, organizing, and tracking resources that facilitates the identification, dispatch, deployment, and recovery of their resources. 2016 Homeland Security Grant applicants must attach a NIMS certification letter of compliance.

37. Why are progress reports required?

Progress reports are necessary to provide DOS the tools to meet its federal reporting and monitoring requirements on the status of grants awarded to the state.

38. Who has to take NIMS and ICS training?

"NIMS Compliance" is required only for those agencies/jurisdictions that wish to apply for any Federal preparedness grants (Homeland Security, Assistance to Firefighters Act, etc.) However, since ICS is used across the country by response agencies for just about all incidents, it is good training to have.

Who needs to take what?

All first responders, regardless of their discipline (police, fire, Ems, etc.), should take ICS 100, ICS 200 and IS 700 or their equivalent training*.* This provides the basic tools needed to understand and use ICS in the field. This training can be done online or in a classroom (with the exception of IS 700 which is only online).

Emergency Management Directors should also take IS 800 which is only available online.

When it comes to ICS 300 and ICS 400, these are advanced ICS courses which are designed for those people who could or would be in what are called Command & General Staff positions (Incident Commander, Operations Section Chief, etc.). In New Hampshire, the only folks who are ***required*** to take these classes are all fire chief officers (chief, assistant chief, deputy chief, etc.), police chiefs of departments with more than 50 members, county sheriffs and certain State Police.

Although anyone is eligible to take these advanced courses, and it would be beneficial for EOC/MACE staff to take them, there is no requirement to do so at this time.

This guidance is from the State only; if your agency or jurisdiction requires that you take this training, then follow that guidance.

Do Selectmen or Town Administrators need this training?

Not that much unless you are also a first responder in some fashion. You should, however, have an understanding of ICS because your employees (first responders) use it. There is a special program for you folks, though. It is short and to-the-point. It's called ICS 402 and it's an overview of ICS that lets you know what ICS is and how it works. If you are only an administrator, this course will satisfy NIMS compliance for grants.

I work in an EOC/MACE. What should I have?

You should have ICS 100 ICS 200 and IS 700 like all other responders. It would help you in your position to have ICS 300 and ICS 400 as well, but it is not required unless your specific plan calls for it.

I took the NFA ICS class or the NH PSTC ICS class. What does this count for?

If you completed the 16 hour ICS class from the National Fire Academy (H806) or the 16 hour NH Police Academy class (Critical Incident Management), you have the equivalent of ICS 100 and ICS 200.

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For further information, please contact Chief Jeffrey Phillips at the DOS – Fire Standards and Training and EMS (603-223-4200).

39. What are the requirements for an HSEEP compliance exercise program?

HSEEP Compliance is defined as adherence to specific HSEEP-mandated practices for exercise program management, design, development, conduct, evaluation, and improvement planning. In order for an entity to be considered HSEEP compliant it must satisfy four distinct performance requirements:

1. Conducting an annual Training and Exercise Plan Workshop and developing and maintaining a Multi-year Training and Exercise Plan.
2. Planning and conducting exercises in accordance with the guidelines set forth in HSEEP Volumes I-III.
3. Developing and submitting a properly formatted After-Action Report/Improvement Plan (AAR/IP). The format for the AAR/IP is found in HSEEP Volume III.
4. Tracking and implementing corrective actions identified in the AAR/IP.

For further information on Exercises, please contact NH DOS Division of Homeland Security and Emergency Management (603-271-2231).

40. What is the Threat and Hazard Identification and Risk Assessment (THIRA)?

FEMA has developed a set of Frequently Asked Questions (FAQ) pertaining to the Comprehensive Preparedness Guidance (CPG) 201: Threat and Hazard Identification and Risk Assessment (THIRA). Topics covered in the FAQ include the identification of supporting THIRA tools, templates and technical assistance, submission procedures, and information on the relationship between THIRA and the State Preparedness Report as well as other reporting requirements.

As part of Presidential Policy Directive / PPD-8, the THIRA provides a common, consistent approach for identifying and assessing risks and their associated impacts. It expands on existing state, local, tribal and territorial hazard identification and risk assessment processes. The THIRA process helps jurisdictions understand likely risks and the core capabilities needed to address them. In New Hampshire the Department of Safety's Division of Homeland Security and Emergency Management is the lead of the THIRA and the annual State Preparedness Report (SPR). Please contact them at 271-2231 for more information.

Frequently Asked Questions – THIRA (FY2012) (this is located at Fema.gov)

41. Why are we having to apply for two grant periods in one application process?

This is anticipated to be a one time adjustment to the grant program. The DHS Program Guidance now requires projected awards to be identified in the state application process. In years past this was done after the state was awarded the grant based on overall program goals approved by DHS The new process for 2017 will allow for DHS to pre-approve all state projects. This will allow the state to meet the requirements for both the FFY2016 and FFY2017 federal grant application process.

42. How will simultaneously applying for two grant programs affect the program dates for completion?

The start dates of these programs will remain the same as they have been in the past with funding awards anticipated to have notifications sent out in the fall of 2016 and fall of 2017. The FFY 2016 grant will allow projects to be completed through August 31, 2019. Although the FFY 2017 grant guidelines have not been released yet, we anticipate those grant funds to be available for projects to be completed through August 31, 2020.

43. Can I submit the same grant project application for FFY 2016 and FFY 2017?

We recommend submitting a different project for each year if you plan on submitting an application for both 2016 & 2017. Any applications that do not result in an award for the FFY2016 grant program will be included and automatically considered for the FFY2017 grant program. Entities are normally able to submit more than one grant application for each grant program therefore having two grant applications being considered for the FFY2017 grant program is allowed.

44. What if my project for FFY 2017 is only able to be completed if the FFY 2016 project funding is awarded?

If an award is not given for the FFY 2016 grant program and an entity ends up having two projects submitted towards the FFY 2017 grant program, priority will be given to the first phase of the overall project.